

**IN THE FEDERAL DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

NILOFER NANLAWALA,

Plaintiff,

v.

CITY OF CHICAGO, a municipal
corporation,

Defendant.

Case No.: 21-cv-5624

Hon. Judge Matthew F. Kennelly

JOINT STATUS REPORT

Pursuant to the Court's August 23, 2022 Order (Dkt. No. 46), the Parties jointly submit this status report on the progress of discovery:

1. On June 11, 2022, the Court extended the discovery cutoff date to October 31, 2022 and the Court stated this was a final extension. (Dkt. No. 33).
2. On August 23, 2022, the Court ordered the Parties file a status report. (Dkt. No. 46).
3. As of this filing, written discovery has been exchanged between the parties.
4. The City deposed plaintiff Nilofer Nanlawala on August 10, 2022. The City is scheduled to depose Hany Shalabi on October, 7, 2022.
5. During the month of September, counsel for Defendant was preparing for and participating in a jury trial that ended on September 27, 2022, before Judge Feinerman in *Outley v. City of Chicago*, 17-CV-8633.
6. On August 10, 2022, Plaintiff provided notice of depositions for the following individuals and dates: Ofcr. Michael Pelrine on October 4, 2022; Lt. Garrity on October 6, 2022; Lt.

Andrew Block on October 19, 2022; Kathryn Perry-Hopkins of H.R on October 26, 2022; and, Deputy Chief Pontecore on October 27, 2022.

7. While Ofcr. Laren Youssef was provided notice of deposition for October 20, 2022, the City informed Plaintiff on September 25, 2022, that Ofcr. Youssef will be on furlough starting October 13 and will be unavailable through the first week of November, after fact discovery is scheduled to end. (Dkt. 33). Plaintiff's schedule only allows for Ofcr. Youssef's deposition to be taken on Oct. 11. The parties are working on rescheduling Ofcr. Youssef's deposition.
8. Lt. Michael Fine (retired) is being subpoenaed for deposition on October 21, 2022 and Cmdr. Melvin Roman (retired) is being subpoenaed for deposition on October 25, 2022.
9. Plaintiff has proposed to the City deposition date of October 18 for Watch Secretary Melyssa LaPorte and the parties are working to confirm these dates.
10. On September 29, 2022, the City subpoenaed for deposition Dr. Ibrahim-Joudeh for October 18, 2022 and Dr. Siddiqui for October 20, 2022. Plaintiff informed the City of the October 18, 2022 scheduling conflict between Melyssa LaPorte and Dr. Ibrahim-Joudeh and are working on reconciling this conflict.
11. Including the above depositions, Plaintiff's counsels either have evidentiary hearings or are conducting depositions on other cases every business day during the month of October except for October 11, 28, and 31, 2022. Accordingly, to ensure that those deponents whose scheduling conflicts have recently arisen are provided the opportunity to be deposed, the parties respectfully request that discovery be extended by 30 days to November 30, 2022.

For the above and foregoing reasons, the Parties respectfully request this Honorable Court deemed that the parties have complied with the Court's Order dated August 23, 2022.

Dated: September 30, 2022

Respectfully submitted,

By: /s/ Christina Abraham

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